

1 **FEDERAL ELECTION COMMISSION**

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3 **FIRST GENERAL COUNSEL'S REPORT**

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5 AUDIT REFERRAL: 17-07R  
6 DATE REFERRED: November 13, 2017  
7 DATE OF NOTIFICATION: November 17, 2017  
8 RESPONSE RECEIVED: December 21, 2017  
9 DATE ACTIVATED: January 29, 2018

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11 EXPIRATION OF SOL: 7/31/2020-10/27/2021  
12 ELECTION CYCLE: 2016

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14 **COMPLAINANT:** Internally Generated

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16 **RESPONDENTS:** Tea Party Majority Fund and Scott B. Mackenzie in  
17 his official capacity as treasurer

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19 **RELEVANT STATUTES AND** 52 U.S.C. § 30104(b)(4)(H)(iii)  
20 **REGULATIONS:** 52 U.S.C. § 30104(b)(8)  
21 52 U.S.C. § 30104(g)  
22 11 C.F.R. § 104.3(b), (d)  
23 11 C.F.R. § 104.4  
24 11 C.F.R. § 104.11

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26 **INTERNAL REPORTS CHECKED:** Disclosure Reports

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28 **FEDERAL AGENCIES CHECKED:** None

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30 **I. INTRODUCTION**

31  
32 The Commission's Reports Analysis Division ("RAD") originally referred Tea Party  
33 Majority Fund and Scott B. Mackenzie in his official capacity as treasurer ("TPMF") to the  
34 Audit Division based on a number of apparent reporting violations. The Commission  
35 subsequently transferred this matter to the Office of the General Counsel ("OGC").<sup>1</sup> The  
36 Referral concerns TPMF's failure to provide supporting schedules for independent expenditures  
37 totaling \$1,809,786.12 made during the 2016 election cycle. Specifically, RAD referred TPMF's

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<sup>1</sup> Certification, 2015-2016 RAD Audit Referrals – Unauthorized Committees (Nov. 9, 2017).

1 apparent failure to file two 48-Hour Reports and disclose debts in three reporting periods. TPMF  
2 contends that it properly reported its debts and filed all necessary 48-Hour Reports.<sup>2</sup>

3 As set forth below, TPMF failed to properly report independent expenditures that were  
4 disseminated prior to payment and disclose debts. We therefore recommend that the  
5 Commission find reason to believe that TPMF violated 52 U.S.C. § 30104(b)(4)(H)(iii) and  
6 11 C.F.R. § 104.4 by failing to accurately report its independent expenditures and 52 U.S.C.  
7 § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a) by not properly disclosing its debts and  
8 obligations, but take no action at this time regarding TPMF's alleged failure to file 48-Hour  
9 Reports. We also recommend that the Commission enter into pre-probable cause conciliation  
10 with TPMF.

## 11 **II. FACTUAL AND LEGAL ANALYSIS**

### 12 **A. Factual Background**

13 TPMF is an independent-expenditure-only political committee that registered with the  
14 Commission on July 21, 2014.<sup>3</sup> In 2015 and 2016, TPMF reported making hundreds of  
15 thousands of dollars in independent expenditures to a vendor for "voter contact calls" in  
16 opposition to presidential candidate Hillary Clinton.<sup>4</sup> Based on a number of questionable  
17 reporting entries, RAD sent TPMF Requests for Additional Information ("RFAs") regarding

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<sup>2</sup> Resp.at 4 (Dec. 21, 2017).

<sup>3</sup> See TPMF, Statement of Organization (July 21, 2014).

<sup>4</sup> See TPMF, 2015 Mid-Year Report (July 27, 2015); 2016 April Quarterly Report (Apr. 15, 2016); 2016 July Quarterly Report (July 11, 2016); 2016 October Quarterly Report (Oct. 8, 2016); and 2016 Pre-General Report (Oct. 26, 2016).

1 TPMF's 2015 Mid-Year Report,<sup>5</sup> 2016 April Quarterly Report,<sup>6</sup> 2016 July Quarterly Report,<sup>7</sup>  
2 2016 October Quarterly Report,<sup>8</sup> and 2016 Pre-General Report.<sup>9</sup> TPMF submitted two amended  
3 2015 Mid-Year Reports<sup>10</sup> along with a response to the RFAI for that period.<sup>11</sup> TPMF did not  
4 address RAD's concerns for any of its 2016 reports.

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A breakdown of the apparent violations per report is listed in the following chart.

REPORT	REFERRED ISSUE
2016 April Quarterly	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$400,000 in IEs that were publicly disseminated prior to payment</li><li>• Failure to file a 48-Hour Report for \$353,273.16 in independent expenditures disclosed on Schedule E</li></ul>
2016 October Quarterly	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$450,000 in IEs that were publicly disseminated prior to payment</li><li>• Failure to file a 48-Hour Report for \$393,569.24 in independent expenditures disclosed on Schedule E</li></ul>

<sup>5</sup> RFAI: Mid-Year Report 2015 (Sept. 22, 2015).

<sup>6</sup> RFAI: April Quarterly 2016 (Jan. 19, 2017).

<sup>7</sup> RFAI: July Quarterly 2016 (Oct. 11, 2016).

<sup>8</sup> RFAI: October Quarterly 2016 (Dec. 5, 2016).

<sup>9</sup> RFAI: Pre-General 2016 (Feb. 23, 2017).

<sup>10</sup> TPMF, 2015 Mid-Year Report: Amendment 1 (Oct. 30, 2015); 2015 Mid-Year Report: Amendment 2 (Jan. 17, 2016).

<sup>11</sup> TPMF, Misc. Report to FEC 2015 (Oct. 30, 2015).

REPORT	REFERRED ISSUE
Amended 2016 12-Day Pre-General	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$212,943.72 in IEs that were publicly disseminated prior to payment</li></ul>

1 On November 17, 2017, the Commission sent a Notification Letter to TPMF stating that  
2 TPMF had been referred to OGC for possible enforcement action.<sup>12</sup> TPMF responded that it  
3 acted in good faith and used best efforts, and the Commission should take no further action.<sup>13</sup>

4 **B. Legal Analysis**

5 The Federal Election Campaign Act of 1971, as amended (the "Act"), requires each  
6 treasurer of a political committee to file reports of receipts and disbursements in accordance with  
7 the provisions of 52 U.S.C. § 30104(b).<sup>14</sup> This requirement includes reporting independent  
8 expenditures ("IEs") made by political committees other than authorized committees.<sup>15</sup> Every  
9 political committee that makes IEs must report them in its regularly scheduled disclosure reports  
10 in accordance with 11 C.F.R. § 104.3(b)(3)(vii).<sup>16</sup> In addition, a political committee that makes  
11 or contracts to make IEs aggregating \$10,000 or more for an election in any calendar year, up to  
12 and including the 20th day before an election, must report these expenditures within 48 hours.<sup>17</sup>

<sup>12</sup> Notification Letter from Jeff Jordan to Scott Mackenzie, Tea Party Majority Fund (Nov. 17, 2017).

<sup>13</sup> Resp. at 4.

<sup>14</sup> 52 U.S.C. § 30104(a)(1).

<sup>15</sup> 52 U.S.C. § 30104(b)(4)(H)(iii); 11 C.F.R. § 104.3(b)(1)(vii).

<sup>16</sup> 11 C.F.R. § 104.4(a). Such a political committee must disclose on Schedule E the name of a person who receives any disbursement during the reporting period in an aggregate amount or value in excess of \$200 within the calendar year in connection with an IE by the reporting committee. The report also must disclose the date, amount, and purpose of any such IE and include a statement that indicates whether such IE is in support of or in opposition to a candidate, as well as the name and office sought by such candidate. IEs of \$200 or less do not need to be itemized, though the committee must report the total of those expenditures on line (b) of Schedule E. *Id.*; see also 11 C.F.R. § 104.3(b)(3)(vii).

<sup>17</sup> 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2).

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1 These reports, known as 48-Hour Reports, must be filed by the end of the second day "following  
2 the date on which a communication that constitutes an independent expenditure is publicly  
3 distributed or otherwise publicly disseminated."<sup>18</sup> Additionally, "[e]very person must include in  
4 the aggregate total all disbursements during the calendar year for independent expenditures, and  
5 all enforceable contracts, either oral or written, obligating funds for disbursements during the  
6 calendar year for independents expenditures, where those independent expenditures are made  
7 with respect to the same election for Federal office."<sup>19</sup>

8 The Act and Commission regulations also require political committees to disclose the  
9 amount and nature of its outstanding debts and obligations until those obligations are  
10 extinguished.<sup>20</sup> A political committee must file separate schedules for debts owed by and to the  
11 committee with a statement explaining the circumstances and conditions under which each debt  
12 and obligation was incurred and extinguished.<sup>21</sup> A similar statement is required where such  
13 debts and obligations are settled for less than their reported amount or value.<sup>22</sup> A debt of \$500 or  
14 less must be reported at the time that payment was made or within 60 days of the date the  
15 political committee incurs the debts, whichever comes first, and a debt exceeding \$500 must be  
16 disclosed in the report that covers the date on which the debt was incurred.<sup>23</sup> Where the exact  
17 amount of a debt is unknown, the report shall state that the amount reported is an estimate and

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<sup>18</sup> 11 C.F.R. § 104.4(b)(2).

<sup>19</sup> *Id.* § 104.4(f).

<sup>20</sup> 52 U.S.C. § 30104(b)(8); 11 C.F.R. §§ 104.3(d), 104.11(a).

<sup>21</sup> *See* 11 C.F.R. § 104.11(a).

<sup>22</sup> 52 U.S.C. § 30104(b)(8); 11 C.F.R. §§ 104.3(d), 104.11(a).

<sup>23</sup> 11 C.F.R. § 104.11(b).

1 the exact amount is to be disclosed in an amended report or on the report for a reporting period in  
2 which such amount is determined.<sup>24</sup> Debts and obligations that remain outstanding shall be  
3 continuously reported until extinguished.<sup>25</sup> Independent expenditures made (i.e., publicly  
4 disseminated) prior to payment should be disclosed as memo entries on Schedule E and as  
5 reportable debt on Schedule D.<sup>26</sup>

6 1. There is Reason to Believe that TPMF Failed to Properly Disclose  
7 Independent Expenditures that were Publicly Disseminated Prior to  
8 Payment

9 In the first quarter of 2016, TPMF listed IEs totaling \$753,273.16: of those,  
10 \$400,000 were marked as memo entries, and the remaining \$353,273.16 were not,<sup>27</sup>  
11 suggesting that TPMF aired and paid for \$353,273.16 in IEs but also aired and had *not*  
12 yet paid for \$400,000 in IEs. In addition, TPMF filed a 48-Hour Report disclosing  
13 \$400,000 in IEs for this period, but RAD questioned why TPMF did not file an additional  
14 48-Hour Report for the remaining \$353,273.16.<sup>28</sup> TPMF did not respond to RAD, but  
15 explained in its response to the Notification Letter that the \$353,273.16 was “related to”  
16 the \$400,000 in expenses already incurred during the same reporting period<sup>29</sup>—in effect,  
17 TPMF appears to have listed both a debt (\$400,000) and its repayment (\$353,273.16) as

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<sup>24</sup> *Id.*

<sup>25</sup> *Id.* § 104.11(a).

<sup>26</sup> See 11 C.F.R. §§ 104.4(f), 104.11; Bipartisan Campaign Reform Act of 2002 Reporting; Coordinated and Independent Expenditures; Final Rules, 68 Fed. Reg. 404, 407 (Jan. 3, 2003) (Explanation and Justification); Factual and Legal Analysis at 9, MUR 6587 (UAEPAC); Factual and Legal Analysis at 2, MUR 6266 (National Right to Life PAC); Campaign Guide for Nonconnected Committees at 72 (2008).

<sup>27</sup> See TPMF, 2016 April Quarterly Report (Apr. 15, 2016) Schedule E; Attach. 3.

<sup>28</sup> See TPMF, 48-Hour Report (Jan. 14, 2016); RFAI: April Quarterly 2016 (Jan. 19, 2017).

<sup>29</sup> Resp. at 3.

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1 IEs. Because TPMF never provided that information in its report, TPMF's 2016 April  
2 Quarterly Report appears to disclose significantly higher IEs (over \$750,000) than the  
3 committee now claims to have actually made (\$400,000).

4 Similarly, for the third quarter of 2016, TPMF listed IEs totaling \$843,569.24, but  
5 that amount appears to be much higher than the amount TPMF now states it actually  
6 spent on IEs. TPMF reported \$450,000 as a memo entry without any explanation, and  
7 also reported \$393,569.24 in non-memo items.<sup>31</sup> TPMF filed a 48-Hour Report  
8 disclosing \$450,000 in IEs for this period, but RAD again questioned why TPMF did not  
9 file a 48-Hour Report for the remaining amount.<sup>32</sup> TPMF again failed to respond to  
10 RAD, and offered the same explanation in response to the Notification Letter—that the  
11 \$393,569.24 was "related to" the \$450,000 in IEs already reported.<sup>33</sup> These amounts are  
12 summarized below.

<b>REPORT</b>	<b>2016 APRIL QUARTERLY REPORT</b>	<b>2016 OCTOBER QUARTERLY REPORT</b>
<b>Total Memo Entry IEs</b>	\$400,000	\$450,000
<b>Total Non-Memo Entry IEs</b>	\$353,273.16	\$393,569.24
<b>Total Apparent IEs</b>	\$753,273.16	\$843,569.24
<b>48-Hour Reports Filed</b>	\$400,000	\$450,000
<b>Debts and Obligations Disclosed</b>	None	\$56,430.76 (\$450,000 - \$393,569.24)

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<sup>31</sup> See Attach. 3.

<sup>32</sup> See TPMF, 48-Hour Report (July 11, 2016); RFAI: October Quarterly 2016 (Dec. 5, 2016).

<sup>33</sup> Resp. at 4.

1           Additionally, the Committee did not report any debts or obligations in its 2016 April  
2           Quarterly Report. As noted above, however, TPMF reported \$400,000 in memo entries, but only  
3           \$353,273.16 in non-memo items. Accepting TPMF's response that the \$353,273.16 was a partial  
4           payment for \$400,000 in expenses, TPMF would have had \$46,726.84 in debts for that reporting  
5           period that should have been disclosed. In its response to the Notification Letter, TPMF does not  
6           dispute that it incurred debt during this period, but instead writes that "[i]n a later amended 1<sup>st</sup>  
7           Quarter 2016 FEC Disclosure Report, the [C]ommittee reported a debt on Schedule D for  
8           \$46,726.84."<sup>34</sup> There is, however, no record of TPMF ever filing an amended 2016 April  
9           Quarterly Report.

10           Furthermore, in its 2016 Amended 12 Day Pre-General Report, TPMF listed a  
11           memo entry for \$212,943.72 with no accompanying information.<sup>35</sup> In its response to the  
12           Notification Letter, TPMF claimed it was merely an amended figure, and "[t]he original  
13           budgeted amount reported was \$450,000; however, the number was reduced to reflect the  
14           actual spending figures. As such, no debt was required to be reported on Schedule D."<sup>36</sup>  
15           However, it is not clear what \$450,000 disclosure TPMF intended to reference, why this  
16           figure was reported as a memo entry, or whether TPMF had any debt at the time of the  
17           filing. Accordingly, in the absence of any coherent explanation, we recommend the  
18           Commission treat this \$212,943.72 as an undisclosed debt.

19           Based on these errors, we recommend that the Commission find reason to believe that  
20           TPMF violated 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4 by failing to accurately

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<sup>34</sup>       Resp. at 3.

<sup>35</sup>       See Attach. 3.

<sup>36</sup>       Resp. at 3.



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**IV. RECOMMENDATIONS**

1. Open a MUR;
2. Find reason to believe that Tea Party Majority Fund and Scott B. Mackenzie in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4;
3. Find reason to believe that Tea Party Majority Fund and Scott B. Mackenzie in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a);
4. Take no action regarding the allegation that Tea Party Majority Fund and Scott B. Mackenzie in his official capacity as treasurer violated 52 U.S.C. § 30104(g)(2) and 11 C.F.R. § 104.4(b)(2);
5. Approve the attached Factual and Legal Analysis;
6. Enter into conciliation with Tea Party Majority Fund and Scott B. Mackenzie in his official capacity as treasurer, prior to a finding of probable cause; and,
7. Approve the appropriate letters.

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Lisa J. Stevenson  
Acting General Counsel

Kathleen M. Guith  
Associate General Counsel for Enforcement

7.20.2018  
Date

*Stephen Gura*  
Stephen Gura  
Deputy Associate General Counsel

*Jin Lee*  
Jin Lee  
Acting Assistant General Counsel

*Amanda Andrade*  
Amanda Andrade  
Attorney

- Attachments:
- 1) Factual and Legal Analysis
  - 2)
  - 3) Chart of TPMF Reporting

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1 **FEDERAL ELECTION COMMISSION**

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3 **FACTUAL AND LEGAL ANALYSIS**

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7 **RESPONDENTS:** Tea Party Majority Fund MUR  
8 and Scott B. Mackenzie  
9 in his official capacity  
10 as treasurer

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12 **I. INTRODUCTION**

13  
14 The Commission's Reports Analysis Division ("RAD") originally referred Tea Party  
15 Majority Fund and Scott B. Mackenzie in his official capacity as treasurer ("TPMF") to the  
16 Audit Division based on a number of apparent reporting violations. The Commission  
17 subsequently transferred this matter to the Office of the General Counsel ("OGC"). The Referral  
18 concerns TPMF's failure to provide supporting schedules for independent expenditures totaling  
19 \$1,809,786.12 made during the 2016 election cycle. Specifically, RAD referred TPMF's  
20 apparent failure to file two 48-Hour Reports and disclose debts in three reporting periods. TPMF  
21 contends that it properly reported its debts and filed all necessary 48-Hour Reports.<sup>1</sup>

22 As set forth below, TPMF failed to properly report independent expenditures that were  
23 disseminated prior to payment and disclose reportable debt. The Commission therefore finds  
24 reason to believe that TPMF violated 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4 by  
25 failing to accurately report its independent expenditures and 52 U.S.C. § 30104(b)(8) and  
26 11 C.F.R. §§ 104.3(d), 104.11(a) by not properly disclosing its debts and obligations.

<sup>1</sup> Resp. at 4 (Dec. 21, 2017).

1 **II. FACTUAL AND LEGAL ANALYSIS**

2 **A. Factual Background**

3 TPMF is an independent-expenditure-only political committee that registered with the  
4 Commission on July 21, 2014.<sup>2</sup> In 2015 and 2016, TPMF reported making hundreds of  
5 thousands of dollars in independent expenditures to a vendor for “voter contact calls” in  
6 opposition to presidential candidate Hillary Clinton.<sup>3</sup> Based on a number of questionable  
7 reporting entries, RAD sent TPMF Requests for Additional Information (“RFAs”) regarding  
8 TPMF’s 2015 Mid-Year Report,<sup>4</sup> 2016 April Quarterly Report,<sup>5</sup> 2016 July Quarterly Report,<sup>6</sup>  
9 2016 October Quarterly Report,<sup>7</sup> and 2016 Pre-General Report.<sup>8</sup> TPMF submitted two amended  
10 2015 Mid-Year Reports<sup>9</sup> along with a response to the RFAI for that period.<sup>10</sup> TPMF did not  
11 address RAD’s concerns for any of its 2016 reports.

12 A breakdown of the apparent violations per report is listed in the following chart.

REPORT	REFERRED ISSUE
2016 April Quarterly	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$400,000 in IEs that were publicly disseminated prior to payment</li></ul>

<sup>2</sup> See TPMF, Statement of Organization (July 21, 2014).

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<sup>4</sup> RFAI: Mid-Year Report 2015 (Sept. 22, 2015).

<sup>5</sup> RFAI: April Quarterly 2016 (Jan. 19, 2017).

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REPORT	REFERRED ISSUE
	<ul style="list-style-type: none"><li>• Failure to file a 48-Hour Report for \$353,273.16 in independent expenditures disclosed on Schedule E</li></ul>
2016 October Quarterly	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$450,000 in IEs that were publicly disseminated prior to payment</li><li>• Failure to file a 48-Hour Report for \$393,569.24 in independent expenditures disclosed on Schedule E</li></ul>
Amended 2016 12-Day Pre-General	<ul style="list-style-type: none"><li>• Failure to disclose a debt on Schedule D where TPMF disclosed \$212,943.72 in IEs that were publicly disseminated prior to payment</li></ul>

1 On November 17, 2017, the Commission sent a Notification Letter to TPMF alerting that  
2 TPMF had been referred to OGC for possible enforcement action.<sup>11</sup> TPMF responded that it  
3 acted in good faith and used best efforts, and the Commission should take no further action.<sup>12</sup>

4 **B. Legal Analysis**

5 The Federal Election Campaign Act of 1971, as amended (the "Act"), requires each  
6 treasurer of a political committee to file reports of receipts and disbursements in accordance with  
7 the provisions of 52 U.S.C. § 30104(b).<sup>13</sup> This requirement includes reporting independent  
8 expenditures ("IEs") made by political committees other than authorized committees.<sup>14</sup> Every  
9 political committee that makes IEs must report them in its regularly scheduled disclosure reports  
10 in accordance with 11 C.F.R. § 104.3(b)(3)(vii).<sup>15</sup> In addition, a political committee that makes

<sup>11</sup> Notification Letter from Jeff Jordan to Scott MacKenzie, Tea Party Majority Fund (Nov. 17, 2017).

<sup>12</sup> Resp. at 4.

<sup>13</sup> 52 U.S.C. § 30104(a)(1).

<sup>14</sup> 52 U.S.C. § 30104(b)(4)(H)(iii); 11 C.F.R. § 104.3(b)(1)(vii).

<sup>15</sup> 11 C.F.R. § 104.4(a). Such a political committee must disclose on Schedule E the name of a person who receives any disbursement during the reporting period in an aggregate amount or value in excess of \$200 within the calendar year in connection with an IE by the reporting committee. The report also must disclose the date, amount, and purpose of any such IE and include a statement that indicates whether such IE is in support of or in opposition to a candidate, as well as the name and office sought by such candidate. IEs of \$200 or less do not need to be itemized, though the committee must report the total of those expenditures on line (b) of Schedule E. *Id.*; see also 11 C.F.R. § 104.3(b)(3)(vii).

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2 and including the 20th day before an election, must report these expenditures within 48 hours.<sup>16</sup>  
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<sup>16</sup> 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2).

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<sup>19</sup> 52 U.S.C. § 30104(b)(8); 11 C.F.R. §§ 104.3(d), 104.11(a).

<sup>20</sup> *See* 11 C.F.R. § 104.11(a).

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1 disclosed in the report that covers the date on which the debt was incurred.<sup>22</sup> Where the exact  
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13 48-Hour Report for the remaining \$353,273.16.<sup>27</sup> TPMF did not respond to RAD, but  
14 explained in its response to the Notification Letter that the \$353,273.16 was “related to”  
15 the \$400,000 in expenses already incurred during the same reporting period<sup>28</sup>—in effect,

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<sup>22</sup> 11 C.F.R. § 104.11(b).

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* § 104.11(a).

<sup>25</sup> See 11 C.F.R. §§ 104.4(f), 104.11; Bipartisan Campaign Reform Act of 2002 Reporting; Coordinated and Independent Expenditures; Final Rules, 68 Fed. Reg. 404, 407 (Jan. 3, 2003) (Explanation and Justification); Factual and Legal Analysis at 9, MUR 6587 (UAEPC); Factual and Legal Analysis at 2, MUR 6266 (National Right to Life PAC); Campaign Guide for Nonconnected Committees at 72 (2008).

<sup>26</sup> See TPMF, 2016 April Quarterly Report (Apr. 15, 2016) Schedule E.

<sup>27</sup> See TPMF, 48-Hour Report (Jan. 14, 2016); RFAI: April Quarterly 2016 (Jan. 19, 2017).

<sup>28</sup> Resp. at 3.

1 TPMF appears to have listed both a debt (\$400,000) and its repayment (\$353,273.16) as  
2 IEs. Because TPMF never provided that information in its report, TPMF's 2016 April  
3 Quarterly Report appears to disclose significantly higher IEs (over \$750,000) than the  
4 committee now claims to have actually made (\$400,000).

5 Similarly, for the third quarter of 2016, TPMF listed IEs totaling \$843,569.24, but  
6 that number appears to be much higher than TPMF's actual IEs. TPMF reported  
7 \$450,000 as a memo entry without any explanation, and also reported \$393,569.24 in  
8 non-memo items. TPMF filed a 48-Hour Report disclosing \$450,000 in IEs for this  
9 period, but RAD again questioned why TPMF did not file a 48-Hour Report for the  
10 remaining amount.<sup>29</sup> TPMF again failed to respond to RAD, and offered the same  
11 explanation in response to the Notification Letter—that the \$393,569.24 was “related to”  
12 the \$450,000 in IEs already reported.<sup>30</sup> These amounts are summarized below.

<b>REPORT</b>	<b>2016 APRIL QUARTERLY REPORT</b>	<b>2016 OCTOBER QUARTERLY REPORT</b>
<b>Total Memo Entry IEs</b>	\$400,000	\$450,000
<b>Total Non-Memo Entry IEs</b>	\$353,273.16	\$393,569.24
<b>Total Apparent IEs</b>	\$753,273.16	\$843,569.24
<b>48-Hour Reports Filed</b>	\$400,000	\$450,000
<b>Debts and Obligations Disclosed</b>	None	\$56,430.76 (\$450,000 - \$393,569.24)

13  
14 Additionally, the Committee did not report any debts or obligations in its 2016 April  
15 Quarterly Report. As noted above, however, TPMF reported \$400,000 in memo entries, but only

<sup>29</sup> See TPMF, 48-Hour Report (July 11, 2016); RFAI: October Quarterly 2016 (Dec. 5, 2016).

<sup>30</sup> Resp. at 4.

1 \$353,273.16 in non-memo items. Accepting TPMF's response that the \$353,273.16 was a partial  
2 payment for \$400,000 in expenses, TPMF would have had \$46,726.84 in debts for that reporting  
3 period that should have been disclosed. In its response to the Notification Letter, TPMF does not  
4 dispute that it incurred debt during this period, but instead writes that "[i]n a later amended 1<sup>st</sup>  
5 Quarter 2016 FEC Disclosure Report, the [C]ommittee reported a debt on Schedule D for  
6 \$46,726.84."<sup>31</sup> There is, however, no record of TPMF ever filing an amended 2016 April  
7 Quarterly Report.

8 Furthermore, in its 2016 Amended 12 Day Pre-General Report, TPMF listed a  
9 memo entry for \$212,943.72 with no accompanying information. In its response to the  
10 Notification Letter, TPMF claimed it was merely an amended figure, and "[t]he original  
11 budgeted amount reported was \$450,000; however, the number was reduced to reflect the  
12 actual spending figures. As such, no debt was required to be reported on Schedule D."<sup>32</sup>  
13 However, it is not clear what \$450,000 disclosure TPMF intended to reference, why this  
14 figure was reported as a memo entry, or whether TPMF had any debt at the time of the  
15 filing. Accordingly, in the absence of any coherent explanation, the Commission will  
16 treat this \$212,943.72 as an undisclosed debt.

17 Based on these errors, the Commission finds reason to believe that TPMF violated  
18 52 U.S.C. § 30104(b)(4)(H)(iii) and 11 C.F.R. § 104.4 by failing to accurately report its  
19 independent expenditures and 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a) by  
20 not properly disclosing its debts and obligations.

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<sup>31</sup> *Id.* at 3.

<sup>32</sup> *Id.*

MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$6,186.37	01/12/16	01/12/16	O	CLINTON	P	AL	X
INFOCISION MANAGEMENT CORP	G2016	\$899.24	01/12/16	01/12/16	O	CLINTON	P	AK	X
INFOCISION MANAGEMENT CORP	G2016	\$8,175.44	01/12/16	01/12/16	O	CLINTON	P	AZ	X
INFOCISION MANAGEMENT CORP	G2016	\$3,749.10	01/12/16	01/12/16	O	CLINTON	P	AR	X
INFOCISION MANAGEMENT CORP	G2016	\$47,833.48	01/12/16	01/12/16	O	CLINTON	P	CA	X
INFOCISION MANAGEMENT CORP	G2016	\$6,541.69	01/12/16	01/12/16	O	CLINTON	P	CO	X
INFOCISION MANAGEMENT CORP	G2016	\$4,674.62	01/12/16	01/12/16	O	CLINTON	P	CT	X
INFOCISION MANAGEMENT CORP	G2016	\$1,182.32	01/12/16	01/12/16	O	CLINTON	P	DE	X
INFOCISION MANAGEMENT CORP	G2016	\$25,352.62	01/12/16	01/12/16	O	CLINTON	P	FL	X

MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$12,329.25	01/12/16	01/12/16	O	CLINTON	P	GA	X
INFOCISION MANAGEMENT CORP	G2016	\$1,801.26	01/12/16	01/12/16	O	CLINTON	P	HI	X
INFOCISION MANAGEMENT CORP	G2016	\$1,947.12	01/12/16	01/12/16	O	CLINTON	P	ID	X
INFOCISION MANAGEMENT CORP	G2016	\$16,445.73	01/12/16	01/12/16	O	CLINTON	P	IL	X
INFOCISION MANAGEMENT CORP	G2016	\$8,279.67	01/12/16	01/12/16	O	CLINTON	P	IN	X
INFOCISION MANAGEMENT CORP	G2016	\$3,934.97	01/12/16	01/12/16	O	CLINTON	P	IA	X
INFOCISION MANAGEMENT CORP	G2016	\$3,614.13	01/12/16	01/12/16	O	CLINTON	P	KS	X
INFOCISION MANAGEMENT CORP	G2016	\$5,635.67	01/12/16	01/12/16	O	CLINTON	P	KY	X
INFOCISION MANAGEMENT CORP	G2016	\$5,817.85	01/12/16	01/12/16	O	CLINTON	P	LA	X

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MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$1,782.35	01/12/16	01/12/16	O	CLINTON	P	ME	X
INFOCISION MANAGEMENT CORP	G2016	\$7,543.04	01/12/16	01/12/16	O	CLINTON	P	MD	X
INFOCISION MANAGEMENT CORP	G2016	\$8,722.67	01/12/16	01/12/16	O	CLINTON	P	MA	X
INFOCISION MANAGEMENT CORP	G2016	\$12,758.48	01/12/16	01/12/16	O	CLINTON	P	MI	X
INFOCISION MANAGEMENT CORP	G2016	\$6,845.70	01/12/16	01/12/16	O	CLINTON	P	MN	X
INFOCISION MANAGEMENT CORP	G2016	\$3,750.39	01/12/16	01/12/16	O	CLINTON	P	MS	X
INFOCISION MANAGEMENT CORP	G2016	\$7,739.82	01/12/16	01/12/16	O	CLINTON	P	MO	X
INFOCISION MANAGEMENT CORP	G2016	\$1,305.82	01/12/16	01/12/16	O	CLINTON	P	MT	X
INFOCISION MANAGEMENT CORP	G2016	\$2,327.00	01/12/16	01/12/16	O	CLINTON	P	NE	X



MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$5,062.90	01/12/16	01/12/16	O	CLINTON	P	OR	X
INFOCISION MANAGEMENT CORP	G2016	\$16,800.18	01/12/16	01/12/16	O	CLINTON	P	PA	X
INFOCISION MANAGEMENT CORP	G2016	\$1,399.94	01/12/16	01/12/16	O	CLINTON	P	RI	X
INFOCISION MANAGEMENT CORP	G2016	\$6,056.91	01/12/16	01/12/16	O	CLINTON	P	SC	X
INFOCISION MANAGEMENT CORP	G2016	\$1,045.08	01/12/16	01/12/16	O	CLINTON	P	SD	X
INFOCISION MANAGEMENT CORP	G2016	\$8,266.04	01/12/16	01/12/16	O	CLINTON	P	TN	X
INFOCISION MANAGEMENT CORP	G2016	\$31,497.31	01/12/16	01/12/16	O	CLINTON	P	TX	X
INFOCISION MANAGEMENT CORP	G2016	\$3,260.01	01/12/16	01/12/16	O	CLINTON	P	UT	X
INFOCISION MANAGEMENT CORP	G2016	\$842.24	01/12/16	01/12/16	O	CLINTON	P	VT	X





MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$664.90	01/12/16	01/29/16	O	CLINTON	P	ID	
INFOCISION MANAGEMENT CORP	G2016	\$5,615.90	01/12/16	01/29/16	O	CLINTON	P	IL	
INFOCISION MANAGEMENT CORP	G2016	\$2,827.35	01/12/16	01/29/16	O	CLINTON	P	IN	
INFOCISION MANAGEMENT CORP	G2016	\$1,343.72	01/12/16	01/29/16	O	CLINTON	P	IA	
INFOCISION MANAGEMENT CORP	G2016	\$1,234.16	01/12/16	01/29/16	O	CLINTON	P	KS	
INFOCISION MANAGEMENT CORP	G2016	\$1,924.47	01/12/16	01/29/16	O	CLINTON	P	KY	
INFOCISION MANAGEMENT CORP	G2016	\$1,986.68	01/12/16	01/29/16	O	CLINTON	P	LA	
INFOCISION MANAGEMENT CORP	G2016	\$608.64	01/12/16	01/29/16	O	CLINTON	P	ME	
INFOCISION MANAGEMENT CORP	G2016	\$2,575.81	01/12/16	01/29/16	O	CLINTON	P	MD	

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MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$2,978.62	01/12/16	01/29/16	O	CLINTON	P	MA	
INFOCISION MANAGEMENT CORP	G2016	\$4,356.78	01/12/16	01/29/16	O	CLINTON	P	MI	
INFOCISION MANAGEMENT CORP	G2016	\$2,337.68	01/12/16	01/29/16	O	CLINTON	P	MN	
INFOCISION MANAGEMENT CORP	G2016	\$1,280.69	01/12/16	01/29/16	O	CLINTON	P	MS	
INFOCISION MANAGEMENT CORP	G2016	\$2,643.00	01/12/16	01/29/16	O	CLINTON	P	MO	
INFOCISION MANAGEMENT CORP	G2016	\$445.91	01/12/16	01/29/16	O	CLINTON	P	MT	
INFOCISION MANAGEMENT CORP	G2016	\$794.63	01/12/16	01/29/16	O	CLINTON	P	NE	
INFOCISION MANAGEMENT CORP	G2016	\$1,183.71	01/12/16	01/29/16	O	CLINTON	P	NV	
INFOCISION MANAGEMENT CORP	G2016	\$596.71	01/12/16	01/29/16	O	CLINTON	P	NH	



MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$478.05	01/12/16	01/29/16	O	CLINTON	P	RI	
INFOCISION MANAGEMENT CORP	G2016	\$2,068.32	01/12/16	01/29/16	O	CLINTON	P	SC	
INFOCISION MANAGEMENT CORP	G2016	\$356.87	01/12/16	01/29/16	O	CLINTON	P	SD	
INFOCISION MANAGEMENT CORP	G2016	\$2,822.69	01/12/16	01/29/16	O	CLINTON	P	TN	
INFOCISION MANAGEMENT CORP	G2016	\$10,755.73	01/12/16	01/29/16	O	CLINTON	P	TX	
INFOCISION MANAGEMENT CORP	G2016	\$1,113.23	01/12/16	01/29/16	O	CLINTON	P	UT	
INFOCISION MANAGEMENT CORP	G2016	\$287.61	01/12/16	01/29/16	O	CLINTON	P	VT	
INFOCISION MANAGEMENT CORP	G2016	\$3,588.16	01/12/16	01/29/16	O	CLINTON	P	VA	
INFOCISION MANAGEMENT CORP	G2016	\$3,016.42	01/12/16	01/29/16	O	CLINTON	P	WA	

10054444001



MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

2016 April Quarterly Report									
Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$1,864.80	01/12/16	02/23/16	O	CLINTON	P	CO	
INFOCISION MANAGEMENT CORP	G2016	\$1,332.56	01/12/16	02/23/16	O	CLINTON	P	CT	
INFOCISION MANAGEMENT CORP	G2016	\$337.04	01/12/16	02/23/16	O	CLINTON	P	DE	
INFOCISION MANAGEMENT CORP	G2016	\$7,227.11	01/12/16	02/23/16	O	CLINTON	P	FL	
INFOCISION MANAGEMENT CORP	G2016	\$3,514.62	01/12/16	02/23/16	O	CLINTON	P	GA	
INFOCISION MANAGEMENT CORP	G2016	\$513.57	01/12/16	02/23/16	O	CLINTON	P	HI	
INFOCISION MANAGEMENT CORP	G2016	\$555.05	01/12/16	02/23/16	O	CLINTON	P	ID	
INFOCISION MANAGEMENT CORP	G2016	\$4,688.08	01/12/16	02/23/16	O	CLINTON	P	IL	
INFOCISION MANAGEMENT CORP	G2016	\$2,360.23	01/12/16	02/23/16	O	CLINTON	P	IN	

1306474010

MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$1,121.72	01/12/16	02/23/16	O	CLINTON	P	IA	
INFOCISION MANAGEMENT CORP	G2016	\$1,030.26	01/12/16	02/23/16	O	CLINTON	P	KS	
INFOCISION MANAGEMENT CORP	G2016	\$1,606.52	01/12/16	02/23/16	O	CLINTON	P	KY	
INFOCISION MANAGEMENT CORP	G2016	\$1,658.46	01/12/16	02/23/16	O	CLINTON	P	LA	
INFOCISION MANAGEMENT CORP	G2016	\$508.08	01/12/16	02/23/16	O	CLINTON	P	ME	
INFOCISION MANAGEMENT CORP	G2016	\$2,150.25	01/12/16	02/23/16	O	CLINTON	P	MD	
INFOCISION MANAGEMENT CORP	G2016	\$2,486.51	01/12/16	02/23/16	O	CLINTON	P	MA	
INFOCISION MANAGEMENT CORP	G2016	\$3,636.98	01/12/16	02/23/16	O	CLINTON	P	MI	
INFOCISION MANAGEMENT CORP	G2016	\$1,951.46	01/12/16	02/23/16	O	CLINTON	P	MN	

100344440010



MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$3,535.47	01/12/16	02/23/16	O	CLINTON	P	NC	
INFOCISION MANAGEMENT CORP	G2016	\$255.62	01/12/16	02/23/16	O	CLINTON	P	ND	
INFOCISION MANAGEMENT CORP	G2016	\$4,247.02	01/12/16	02/23/16	O	CLINTON	P	OH	
INFOCISION MANAGEMENT CORP	G2016	\$1,369.96	01/12/16	02/23/16	O	CLINTON	P	OK	
INFOCISION MANAGEMENT CORP	G2016	\$1,443.25	01/12/16	02/23/16	O	CLINTON	P	OR	
INFOCISION MANAGEMENT CORP	G2016	\$4,789.12	01/12/16	02/23/16	O	CLINTON	P	PA	
INFOCISION MANAGEMENT CORP	G2016	\$399.07	01/12/16	02/23/16	O	CLINTON	P	RI	
INFOCISION MANAGEMENT CORP	G2016	\$1,726.60	01/12/16	02/23/16	O	CLINTON	P	SC	
INFOCISION MANAGEMENT CORP	G2016	\$297.91	01/12/16	02/23/16	O	CLINTON	P	SD	

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MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$2,356.35	01/12/16	02/23/16	O	CLINTON	P	TN	
INFOCISION MANAGEMENT CORP	G2016	\$8,978.74	01/12/16	02/23/16	O	CLINTON	P	TX	
INFOCISION MANAGEMENT CORP	G2016	\$929.31	01/12/16	02/23/16	O	CLINTON	P	UT	
INFOCISION MANAGEMENT CORP	G2016	\$240.09	01/12/16	02/23/16	O	CLINTON	P	VT	
INFOCISION MANAGEMENT CORP	G2016	\$2,995.35	01/12/16	02/23/16	O	CLINTON	P	VA	
INFOCISION MANAGEMENT CORP	G2016	\$2,518.06	01/12/16	02/23/16	O	CLINTON	P	WA	
INFOCISION MANAGEMENT CORP	G2016	\$705.56	01/12/16	02/23/16	O	CLINTON	P	WV	
INFOCISION MANAGEMENT CORP	G2016	\$2,104.14	01/12/16	02/23/16	O	CLINTON	P	WI	
INFOCISION MANAGEMENT CORP	G2016	\$207.85	01/12/16	02/23/16	O	CLINTON	P	WY	

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MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPF Reporting

16084440091

2016 April Quarterly Report									
Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$246.00	01/12/16	02/23/16	O	CLINTON	P	DC	
INFOCISION MANAGEMENT CORP	G2016	\$1,587.66	01/12/16	03/29/16	O	CLINTON	P	AL	
INFOCISION MANAGEMENT CORP	G2016	\$230.78	01/12/16	03/29/16	O	CLINTON	P	AK	
INFOCISION MANAGEMENT CORP	G2016	\$2,098.13	01/12/16	03/29/16	O	CLINTON	P	AZ	
INFOCISION MANAGEMENT CORP	G2016	\$962.16	01/12/16	03/29/16	O	CLINTON	P	AR	
INFOCISION MANAGEMENT CORP	G2016	\$12,275.80	01/12/16	03/29/16	O	CLINTON	P	CA	
INFOCISION MANAGEMENT CORP	G2016	\$1,678.85	01/12/16	03/29/16	O	CLINTON	P	CO	
INFOCISION MANAGEMENT CORP	G2016	\$1,199.69	01/12/16	03/29/16	O	CLINTON	P	CT	
INFOCISION MANAGEMENT CORP	G2016	\$303.43	01/12/16	03/29/16	O	CLINTON	P	DE	

MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

**2016 April Quarterly Report**

Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last-Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$6,506.46	01/12/16	03/29/16	O	CLINTON	P	FL	
INFOCISION MANAGEMENT CORP	G2016	\$3,164.16	01/12/16	03/29/16	O	CLINTON	P	GA	
INFOCISION MANAGEMENT CORP	G2016	\$462.27	01/12/16	03/29/16	O	CLINTON	P	HI	
INFOCISION MANAGEMENT CORP	G2016	\$499.71	01/12/16	03/29/16	O	CLINTON	P	ID	
INFOCISION MANAGEMENT CORP	G2016	\$4,220.61	01/12/16	03/29/16	O	CLINTON	P	IL	
INFOCISION MANAGEMENT CORP	G2016	\$2,124.88	01/12/16	03/29/16	O	CLINTON	P	IN	
INFOCISION MANAGEMENT CORP	G2016	\$1,009.86	01/12/16	03/29/16	O	CLINTON	P	IA	
INFOCISION MANAGEMENT CORP	G2016	\$927.53	01/12/16	03/29/16	O	CLINTON	P	KS	
INFOCISION MANAGEMENT CORP	G2016	\$1,446.33	01/12/16	03/29/16	O	CLINTON	P	KY	

1004744001







MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

1083440000

2016 April Quarterly Report									
Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$216.15	01/12/16	03/29/16	O	CLINTON	P	VT	
INFOCISION MANAGEMENT CORP	G2016	\$2,696.67	01/12/16	03/29/16	O	CLINTON	P	VA	
INFOCISION MANAGEMENT CORP	G2016	\$2,266.98	01/12/16	03/29/16	O	CLINTON	P	WA	
INFOCISION MANAGEMENT CORP	G2016	\$635.21	01/12/16	03/29/16	O	CLINTON	P	WV	
INFOCISION MANAGEMENT CORP	G2016	\$1,894.33	01/12/16	03/29/16	O	CLINTON	P	WI	
INFOCISION MANAGEMENT CORP	G2016	\$187.13	01/12/16	03/29/16	O	CLINTON	P	WY	
INFOCISION MANAGEMENT CORP	G2016	\$221.44	01/12/16	03/29/16	O	CLINTON	P	DC	
<b>Subtotal</b>		<b>\$353,273.16</b>							

MUR \_\_\_\_ (Tea Party Majority Fund)  
 Chart of TPMF Reporting

10034440000

2016 October Quarterly Report									
Vendor Name	Election	Amount	Dissemination Date	Disbursement Date	Support /Oppose	Candidate Last Name	Office Sought	State	Memo Code
INFOCISION MANAGEMENT CORP	G2016	\$450,000.00	07/09/16	07/09/16	O	CLINTON	P	N/A	X
INFOCISION MANAGEMENT CORP	G2016	\$39,705.68	07/09/16	07/11/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$75,402.44	07/09/16	07/18/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$18,701.03	07/09/16	07/28/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$84,673.31	07/09/16	08/05/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$61,086.75	07/09/16	08/17/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$61,369.69	07/09/16	08/29/16	O	CLINTON	P	N/A	
INFOCISION MANAGEMENT CORP	G2016	\$52,630.34	07/09/16	09/21/16	O	CLINTON	P	N/A	
<b>Subtotal</b>		<b>\$393,569.24</b>							

